



July 3, 2015

BY ECF

Honorable Pamela K. Chen
United States District Judge, EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Li v. City of New York, et al., 15-CV-01599 (PKC) (MDG)

Your Honor:

I, along with attorneys Corey Lee and Jenny Marashi, am counsel for Plaintiff in the above-captioned action. We write to respectfully request that the time to serve certain retired, inactive, or otherwise not presently locatable police officer defendants in this case be extended to 30 days from when we receive a location to serve them from the New York City Law Department.

Defendants Det. David Moser, Lt. John Perdoch, and Det. Michael Heffernan apparently retired from the NYPD in September 2012, July 2013, and February 2010, respectively. Defendant Lt. Arthur Hall is currently on "inactive" status with the NYPD, and defendants Det. Dennis Chan, Det. Douglas Lee, and Sgt. Guisella Rodriguez cannot presently be located because we lack their tax and shield numbers.

The Law Department's and NYPD's standard protocol for addressing service upon retired and/or inactive officers is to reach out to them to ask if they are willing to allow the NYPD's Legal Division to accept service of the case initiating documents on their behalves. While typically the retired officers agree to this, in those rare instances where they do not, we would then request the officer's home address to serve him or her.

We will request that the Law Department initiate that process promptly, but it can sometimes take some time, and may not occur prior to the 120th day from the filing of the Complaint (which is July 24, 2015). If the retired and inactive officers consent to service at the NYPD Legal Bureau, we will promptly serve them there upon receipt of that information.

We respectfully request, however, that the time to serve these officers be extended to 30 days from whenever we receive that officer's service location from the New York City Law Department, in the event that service needs to be effected at the officer's home address (or elsewhere).

Thank you for your consideration.

Respectfully submitted,


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BY E-MAIL AND FIRST-CLASS MAIL

Cc: ACC Frances Sands
NYC Law Department
Special Federal Litigation Division
100 Church Street
New York, NY 10007
E-Mail: fsands@law.nyc.gov

BY E-MAIL

Corey Lee, Esq.
Jenny Marashi, Esq.